

24 CR 317 MJD/JFD

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 842(i)(1)
)	18 U.S.C. § 844(a)(1)
v.)	18 U.S.C. § 844(c)(1)
)	18 U.S.C. § 921(a)(3)(D)
WAYNE ROBERT LUND,)	18 U.S.C. § 921(a)(4)
)	18 U.S.C. § 921(a)(17)(A)
Defendant.)	18 U.S.C. § 922(g)(1)
)	18 U.S.C. § 924(a)(8)
)	18 U.S.C. § 924(d)(1)
)	26 U.S.C. § 5845(a)
)	26 U.S.C. § 5845(f)
)	26 U.S.C. § 5861(d)
)	26 U.S.C. § 5871
)	28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

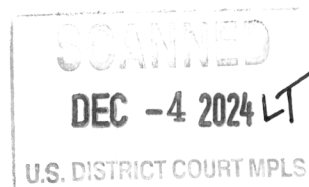
COUNT 1

(Possession of Unregistered Firearms)

On or about November 2, 2024, in the State and District of Minnesota, the
defendant,

WAYNE ROBERT LUND,

did knowingly possess unregistered firearms, as defined by Title 26, United States
Code, Section 5845(a)(8), that is, eight destructive devices, as defined by Title 26,
United States Code, Section 5845(f), not registered to him in the National Firearms
Registration and Transfer Record, all in violation of Title 26, United States Code,
Sections 5861(d) and 5871.



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COUNT 2

(Felon in Possession of Explosives)

On or about November 2, 2024, in the State and District of Minnesota, the defendant,

WAYNE ROBERT LUND,

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely,

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
Felony Driving While Impaired	Ramsey County, MN	August 2004
Terroristic Threats	Anoka County, MN	September 2014

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess explosives, which had been shipped and transported in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 842(i)(1) and 844(a)(1).

COUNT 3

(Felon in Possession of Firearms)

On or about November 2, 2024, in the State and District of Minnesota, the defendant,

WAYNE ROBERT LUND,

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely,

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Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
Felony Driving While Impaired	Ramsey County, MN	August 2004
Terroristic Threats	Anoka County, MN	September 2014

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, firearms, as defined by Title 18, United States Code, Section 921(a)(3)(D), that is, eight destructive devices, as defined by Title 18, United States Code, Section 921(a)(4), all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 4

(Felon in Possession of Ammunition)

On or about November 2, 2024, in the State and District of Minnesota, the defendant,

WAYNE ROBERT LUND,

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely,

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
Felony Driving While Impaired	Ramsey County, MN	August 2004
Terroristic Threats	Anoka County, MN	September 2014

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, ammunition, as defined by Title 18, United States Code, Section

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921(a)(17)(A), that is, approximately 555 rounds of various caliber ammunition, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE ALLEGATIONS

Counts 1 through 4 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeitures, pursuant to Title 18, United States Code, Sections 844(c)(1) and 924(d)(1), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

If convicted of Count 1 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, in conjunction with Title 28, United States Code, Section 2461(c), any firearm involved in, or used in any knowing violation of, the National Firearms Act including, but not limited to: seven cricket-style explosive devices, one capped pipe-bomb explosive device, and all accessories seized therewith on or about November 2, 2024.

If convicted of Count 2 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 844(c)(1), in conjunction with Title 28, United States Code, Section 2461(c), any explosives, explosive materials, and accessories (including any blasting agents, detonators, fuses, CO2 cartridges, and other explosive device accessories) involved in, or used in any knowing violation of, the offense alleged, including, but not limited to: seven cricket-style explosive devices, one capped pipe-bomb explosive device, and all accessories seized therewith on or about November 2, 2024.

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If convicted of any of Counts 3 and 4 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), any firearms, accessories, and ammunition involved in, or used in any knowing violation of, the offenses alleged, including, but not limited to: seven cricket-style explosive devices, one capped pipe-bomb explosive device, and all accessories seized therewith; 555 rounds of various caliber ammunition; and all other accessories, magazines, and ammunition seized with the firearms and ammunition on or about November 2, 2024.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON